

MAY 19 2025

Civil Complaint  
In The United States District Court  
For The Northern District of Illinois, Eastern Division

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Plaintiffs

- 1) Joshua Hall ID #104525  
501 Mall Road Harrisburg, PA 17111-1299
- 2) Eric Heilner ID #110602  
501 Mall Road Harrisburg, PA 17111-1299

25-cv-5593  
Judge Edmond E. Chang  
Magistrate Judge Heather K. McShain  
Random PC 7

On behalf of the American citizenry of the state of Illinois  
and Governor Rod Blagojevich

VS.

Defendants

- 1) JB Pritzker, Governor of Illinois, in his personal and official capacity
- 2) State of Illinois
- 3) Illinois General Assembly
- 4) Barack Hussein Obama, former President and Illinois state Senator,  
in his personal and official capacity
- 5) Patrick J. Quinn, former Governor and Lieutenant Governor of  
Illinois, in his personal and official capacity
- 6) Michael J. Madigan, former Speaker of the Illinois House of  
Representatives, in his personal and official capacity
- 7) Lisa Madigan, former Attorney General of Illinois, in her personal  
and official capacity
- 8) Patrick J. Fitzgerald, former U.S. Attorney for the Northern  
District of Illinois, in his personal and official capacity

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- 9) Robert S. Mueller III, former FBI Director, in his personal and official capacity
- 10) James B. Comey Jr., former FBI Director, in his personal and official capacity
- 11) Eric H. Holder Jr., former United States Attorney General, in his personal and official capacity
- 12) Every Foreign Intelligence Surveillance Court ("FISA Court") in The United States of America and every FISA judge therein, in their personal and official capacities
- 13) The Federal Bureau of Investigation and every agent therein who "investigated" the case against Illinois Governor Rod Blagojevich
- 14) James B. Zagel, former United States District Judge for the Northern District of Illinois, in his personal and official capacity
- 15) Steven C. Seeger, United States District Judge for the Northern District of Illinois, in his personal and official capacity
- 16) Richard J. Durbin, United States Senator for the state of Illinois, in his personal and official capacity
- 17) Rahm Emmanuel, former Chief of Staff and emissary for President Barack Hussein Obama, in his personal and official capacity
- 18) Tammy Duckworth, United States Senator for the state of Illinois and former Director, Illinois Department of Veterans Affairs in her personal and official capacity

To Be Filed Under: ✓ 42 U.S.C. § 1983 - State Officials  
✓ 28 U.S.C. § 1331 - Federal Officials

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## I. Previous Lawsuits

Two currently pending in The United States District Court For The District of Columbia filed on April 15<sup>th</sup>, 2025 and April 21<sup>st</sup>, 2025, respectively and one currently pending in The United States District Court For The Southern District of Texas, Brownsville Division filed on May 5<sup>th</sup>, 2025.

## II. Statement of Claim

We bring forth this lawsuit on behalf of the American citizenry of the state of Illinois and Governor Rod Blagojevich to correct the illegal impeachment, removal from office and prosecution of Governor Blagojevich and restore his status as the duly-elected Governor of the state of Illinois to finish serving out his second term in office—which was illegally robbed from him and by extension the people of Illinois. Defendants engaged in a RICO conspiracy to frame Governor Blagojevich for crimes that he did not commit and they themselves are actually guilty of. President Donald J. Trump has since corrected this historic injustice by pardoning Governor Blagojevich and adjudicating him innocent of all charges in his official capacity as The President of The United States and The Chief Law Enforcement Officer in our country whose authority is above this court or any other in our nation. Governor Blagojevich's impeachment and removal from office by The Illinois General Assembly in January of 2009 based upon these false charges was thus unlawful and must be immediately NULLED AND VOIDED and he must be immediately returned to the office of Governor to finish the term that he was lawfully elected. (turn pg)



by the citizens of Illinois to serve. The very same malicious actors within our government who went after and attempted to undermine the will of the American people by illegally removing President Trump from office did the very same thing, only successfully, to the people of Illinois and Governor Blagojevich. We demand "America's Governor" Blago's immediate return to office. Defendants must be found guilty and civilly liable for violations of Governor Blagojevich's 4<sup>th</sup> Amendment rights by illegally spying on and surveilling him and his due process rights under the 14<sup>th</sup> Amendment for depriving him of his liberty without allowing him to play the tapes that would have exonerated him at trial. They must also be found guilty and civilly liable for violations of The Espionage Act regarding the illegal wiretap of Governor Blagojevich's home and private phones, engaging in a RICO conspiracy to frame, convict and imprison him for crimes that they themselves are guilty of and the false imprisonment for 8 years that Governor Blagojevich was illegally subjected to now that he has been found innocent of these charges by The President of The United States. They must also be found guilty and liable for conspiracy against rights for their illegal deprivation of the right of the citizens of Illinois to elect their own leaders by illegally removing Governor Blagojevich from office as well as conspiracy to defraud the people of Illinois. The defendants must also be referred to US Attorney General to face possible criminal charges for these many violations of federal law. We trust that Pamela Bondi will hold them accountable and give them the very due process and fair trial that they deprived Governor Blagojevich of. The specific allegations and charges against each defendant in this case we lay out below. We have standing.../next page



to bring this lawsuit as American citizens who have suffered irreparable harm from Governor Blagojevich's illegal impeachment, removal from office and prosecution in the form of the deprivation of our Governor from us and our right to vote for and elect the leaders that we choose. We have also suffered from the intentional infliction of emotional distress upon us and immeasurable pain and suffering from defendants' actions illegally infringing upon us and our fellow citizens' fundamental rights. Finally, as courts across the country have held in the many cases brought by alleged Tren de Aragua gang members being removed from our country by the Trump administration, it is always in the public interest to have a government that respects the people's rights and abides by the law. If this principle holds true in the cases of illegal aliens who do not have a legal right to be in this country in the first place, it surely holds true in this case involving the deprivation of Constitutionally protected rights of actual American citizens. We thus have more than met the bar to establish our standing to bring this case. The specific allegations of each defendant's illegal conduct we bring forth below.

1) JB Pritzker, the current Governor of Illinois, was on the tapes discussing a possible deal to be appointed as the successor to take over then President-elect Barack Obama's US Senate seat with Governor Blagojevich. Pritzker was power hungry and bitter that Governor Blagojevich chose to select someone else for the seat. He thus threw Governor Blagojevich under the bus even though he knew that he was an innocent man simply trying to orchestrate a routine political deal (Political logrolling, as the ~~man~~ (turn pg)



Appeals Court called it). Pritzker thus conspired with the remaining defendants against the rights of the people of Illinois by helping to create the fake case against Blagojevich and lying to the FBI... All to best serve his own political ambitions. He is illegally occupying the office of Governor of Illinois and must be impeached and removed by The Illinois General Assembly immediately for his crimes against Governor Blagojevich and the people of the state of Illinois.

2) The State of Illinois and The Illinois General Assembly are civilly liable for their illegal impeachment and removal from office of Governor Blagojevich in January of 2009 on the basis of criminal charges that he has now been pardoned for and found/declared innocent of by President Trump, The Chief Law Enforcement Officer in The United States. President Trump pardoned Governor Blagojevich on actual innocence grounds and thus his criminal conviction no longer stands. The basis for his impeachment by The Illinois General Assembly has been found to be factually false and thus constitutes a "fruit of the poisonous tree" argument. The impeachment itself was illegal and must be immediately VACATED and NULLED AND VOIDED by this court. Governor Blagojevich thus must be declared the duly-elected sitting Governor of Illinois and allowed to serve out his lawful term in office and seek re-election if he so chooses.

3) Barack Obama is civilly liable for the sale of his former US Senate seat himself because he is the one who sent his emissary to Governor Blagojevich to start negotiations with him to make a political deal (ie routine political horse-trading). Obama personally ordered and oversaw the illegal conspiracy to frame and prosecute Blagojevich because he had a contentious personal.....(next page)



relationship with the Governor stemming back to his time working with him as an Illinois state Senator and sought to eliminate Blagojevich as a potential political threat due to his "rising star" status within The Democratic Party. Blagojevich also had "dirt" and potentially embarrassing and politically damaging information on then President-elect Obama from their time serving together in the notoriously corrupt world of Illinois politics. When Obama's attempted "political deal" with the Governor fell through and Blagojevich conveyed that he would not select Obama's hand-picked replacement Valerie Jarrett for his Senate seat for, as he famously put it, "f-cking nothing", Obama became embittered and spiteful. He thus began lying to the FBI and setting up the entire "frame job" with the other named defendants against Governor Blagojevich out of personal and political spite as well as desperate political self-preservation heading into his disastrous, corrupt 8-year presidency. He is thus civilly and quite likely criminally liable for lying to the FBI, RICO conspiracy (leadership enhancement) and conspiring against the rights of the people of Illinois.

4) Former Illinois Lieutenant Governor and Governor Blagojevich's successor after his illegal removal from office, Patrick J. Quinn, also for years illegally and illegitimately held the Office of Illinois Governor. He had not spoken to Governor Blagojevich for over a year prior to his illegal assuming of office and was involved in the illegal scheme to oust Governor Blagojevich from office out of sheer political calculus and disagreement over policy. Upon taking office, he immediately raised taxes on the people of Illinois - which Governor Blagojevich was vigorously fighting Speaker Madigan to prevent from happening.....(turn page).....



Defendant Quinn thus participated in the conspiracy and lied to the FBI about the perfectly legal dealings of Governor Blagojevich to become Governor of Illinois in furtherance of his own political ambition. This is why even as the number two in the Blagojevich administration, Barack Obama's Department of Justice left him alone but went after others who were below him. Quinn's entire term as Governor of Illinois was thus unlawful and must be declared NULL and VOID by this court along with every law that was enacted during his illegal tenure.

5) Former Illinois House Speaker Michael J. Madigan, who is now under federal indictment on corruption charges himself, was the key player in putting together the phony impeachment hoax on his longtime political rival, Governor Blagojevich. Embittered because Blagojevich decided not to select his daughter, then-Illinois Attorney General Lisa Madigan for then President-elect Obama's successor in the US Senate and as aforementioned Blagojevich refused Madigan's demands to raise taxes on the citizens of Illinois, Speaker Madigan then conspired with the other defendants in their illegal plot to oust the Governor from office on charges they knew him to be innocent of by weaponizing the impeachment process against him. It was a calculated act of revenge against his long-time political adversary in order to further solidify Speaker Madigan's iron-clad grip on power for decades in Illinois politics and Speaker Madigan is thus liable for his role in furtherance of the RICO conspiracy and conspiring against the rights of his fellow Illinois citizens.

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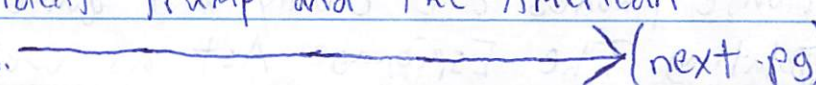


6) Former U.S. Attorney for The Northern District of Illinois Patrick J. Fitzgerald, at the behest of his long-time friend James Comey and then-FBI Director Robert S. Mueller III, illegally conspired with the defendants to bring these charges against Governor Blagojevich that he knew the Governor to be innocent of and thus is liable for conspiracy against the rights of the people of Illinois, the violation of Governor Blagojevich's right to due process under the 14<sup>th</sup> Amendment by withholding exonerating evidence from him as well as the false imprisonment of Governor Blagojevich. These are the very same players who fabricated the Russian collusion hoax against President Trump and tried to remove him from office in that treasonous scheme. We are thus demanding that this court hold them civilly liable and are asking Attorney General Bondi to prosecute them to the fullest extent of the law for their decades-long crime spree against our nation.

7) Attorney General Eric H. Holder, Jr. is civilly liable for overseeing the illegal and malicious prosecution of Governor Blagojevich in furtherance of the RICO conspiracy in his official capacity as The United States Attorney General during the years-long illegitimate prosecution. He is thus also the responsible and liable party for the due process violations and false imprisonment of Governor Blagojevich now that he has been found and declared factually innocent of the charges.

8) Former FBI Director Robert S. Mueller III and The FISA (Foreign Intelligence Surveillance Court) judge that authorized the illegal wiretap of Governor Blagojevich's home and private phones are civilly and quite likely criminally liable for violating The Espionage Act as well as the 4<sup>th</sup> Amendment. (next pg)



rights of Governor Blagojevich and his family by illegally spying on and surveilling them without any grounds to do so whatsoever. This is exactly what this same cast of characters did to The Trump campaign and President Trump himself in the lead-up to the 2016 presidential election - Lying to a FISA court to illegally obtain an unConstitutional warrant to spy on them - also at the direction of then-President Obama, interestingly enough. Any so-called "evidence" that was gathered against Governor Blagojevich by way of this illegal espionage on an American citizen and a sitting Governor at that for purely political purposes was thus inadmissible at trial on the basis that it was illegally gathered and thus constitutes fruits of the poisonous tree. If they can do this to a sitting Governor or a President of The United States, then it is scary to imagine what they can do to an ordinary citizen whose political views they happen to dislike. FISA courts are completely illegal, unConstitutional and violate the 4<sup>th</sup> Amendment rights of all Americans. Any government actor who has used them to spy on an American citizen must be held liable for violating The Espionage Act as the aforementioned defendants as well as every FBI agent who illegally surveilled Governor Blagojevich and his family's communications must in this case. The mass surveillance and police state that these bad faith government actors have turned what is supposed to be "The land of the free" in to would shake our Founders to their core. It is the duty of we the people to reign it in and it starts with holding these defendants liable and accountable for their illegal actions that infringed upon the rights of Governor Blagojevich, President Trump and the American citizenry as a whole.  (next pg.)



9) The Federal Bureau of Investigation and every agent therein who "investigated" this phony, malicious case against Governor Blagojevich must also be held civilly liable for the intentional emotional distress that they inflicted upon him and his family when they conducted an armed raid of the Governor's residence over non-violent allegations in the pre-dawn hours of that fateful morning in December 2008. This clearly constituted excessive force and was meant to terrorize Governor Blagojevich and his family rather than execute an arrest warrant. This, too, happened to one of the plaintiffs in this case (Joshua Hall) in June of 2021 and traumatized my family and I. These police state tactics and the politicization and weaponization of law enforcement against the citizenry as a means of intimidation must stop. The FBI had been unfairly and selectively targeting Governor Blagojevich and his administration from the day he took office in 2003 just like they targeted President Trump from before he was even sworn in. Because Governor Blagojevich has now been found by the highest law enforcement official in the land to be innocent of these charges, the FBI's pre-dawn raid of him was illegal, unconstitutional and constitutes false arrest and imprisonment and they must be found civilly liable on the foregoing claims as such.

10) Former federal judge James B. Zagel of the Northern District of Illinois illegally deprived Governor Blagojevich of a multitude of Constitutional rights during the two sham trials that he presided over including admitting evidence that was illegally obtained by the wiretaps in violation of the Governor's 4<sup>th</sup> Amendment rights yet refusing to allow Governor Blagojevich to (turn pg).



to present evidence in the form of tape recordings that were favorable to his defense which constitutes a violation of the Governor's due process rights under the 14<sup>th</sup> Amendment. He also refused to disclose the identities of the members of the jury during the trials which violated the public and Governor Blagojevich's right to know who was deciding on his guilt. Judge Zagel demonstrated extreme bias and hostility toward Blagojevich during the duration of the trials and imposed a 14-year draconian prison sentence that far exceeded anything reasonable for the non-violent allegations that were brought forth and violated the Governor's 8<sup>th</sup> Amendment right to be free from cruel and unusual punishments. He deprived the people of Illinois of their duly-elected Governor by falsely imprisoning him on charges that defendant Zagel knew Blagojevich to be innocent of and hence conspired against the rights of the citizens of Illinois and conspired to defraud them. Zagel's illegal actions are not covered by judicial immunity because he was absent of any and all jurisdiction to deprive Governor Blagojevich and the citizens of Illinois of their Constitutional rights and illegally imprison the Governor since the highest law enforcement official in the country, President Trump, has found Governor Blagojevich innocent on all of the fake charges that were brought which makes the entire charade that Judge Zagel "presided" over an illegitimate process conducted by a kangaroo court that masqueraded as a lawful judicial process but in fact was anything but. Shams like these Soviet-style "show trials" of Governor Blagojevich are why trust in the courts are at an all-time low in this country right now. What Judge Zagel did to Governor Blagojevich was illegal, unconstitutional and a crime in of itself and the people of.....(next pg)



Illinois are all victims of it. It was an early foreshadowing and beginning of an era of lawlessness and illegitimacy on the part of the judiciary that has made a mockery of the Constitution itself and the rule of law. They graduated from one judge getting away with doing this to a Governor to dozens of judges all across our country working to persecute and undermine a duly-elected President on an unprecedented scale. We the people are afforded the sacred right to elect our leaders to represent us by voting and whether that leader we choose be a Democratic Governor such as Blagojevich or a Republican President such as Trump, no un-elected judge may undo that choice and take that right away from us. What Judge Zagel did along with the rest of the defendants in this lawsuit to Governor Blagojevich and what judicial activists wearing robes are doing to President Trump all across our country right now is an active and ongoing threat to American democracy and we the citizenry will stand for it no longer. This lawsuit is about protecting the rights of the people and accountability for those who have infringed upon them which is why defendant Zagel must be found civilly liable for his aforementioned numerous violations of the Constitutional rights of Governor Blagojevich and the people of Illinois which are NOT protected by judicial immunity.

11) Federal Judge Steven C. Seeger of the Northern District of Illinois illegally deprived Governor Blagojevich of his right to have his impeachment and removal from office NULLED AND VOIDED and his right to once again seek elected office in the state of Illinois if he so chooses despite Governor Blagojevich being adjudicated and exonerated as innocent of all charges by President Trump. Because Blagojevich was found innocent (turn pg)



to be innocent of all charges by the highest law enforcement officer in the land and all of the impeachment and criminal proceedings that took place against him are thus invalidated and illegitimate, defendant Seeger was thus absent of any and all grounds and jurisdiction when he refused to NULL AND VOID Governor Blagojevich's impeachment and restore his right to seek office again now that he has been vindicated. Defendant Seeger's illegal actions against Blagojevich are therefore not protected by judicial immunity and he is thus liable for violating Blagojevich's fundamental First Amendment right to seek state office in Illinois as well as conspiring to defraud the people of Illinois and conspiring against the rights of the citizens of Illinois to vote for whomever they want to represent them - including but not limited to Governor Blagojevich. It is once again a brazen, illegal act of judicial overreach to infringe upon the rights of the people by a federal judge. Because of the extreme bias and hostility that defendant Seeger put on full display against Governor Blagojevich in his egregious opinion in his illegal ruling against him as well as the fact that defendant Seeger is a party in this case, we assert that he not be assigned to preside over this matter because his doing so would be highly unethical and constitute a grave conflict of interest that would be detrimental to the reputation of these proceedings.

As a final note we, the plaintiffs in this case, are supporters of President Trump who is of course a Republican President. But we are bringing this lawsuit on behalf of a Democratic Governor and the voters who elected him - The vast majority. (next pg)



of whom are Democrats. That is because while we likely disagree with some of Governor Blagojevich's policy positions and beliefs, to us that is miniscule compared to the dangers of our government impeding upon the rights of the citizenry - which is exactly what happened in this case and is exactly what is happening to President Trump and the citizens who elected him to enact our agenda on a much larger scale in cases all across our country at this very moment. Protecting the Constitutional rights of the citizenry is not a partisan issue and the weaponization of our government against we the people is a dire threat to every American citizen - No matter who one may have voted for. We stand up for Governor Blagojevich and demand accountability from these defendants who illegally removed him from office and imprisoned him for 8 years for the simple reason that what happened in his case was an egregious assault on the citizenry who put him into office to represent them. This was more like something you would have expected to happen in Russia or communist China than in The United States of America. As President Trump famously put it while running for re-election, "For all of those who have been wronged - I am your retribution". Let the record reflect that this lawsuit is a moment of reckoning for those who so callously wronged Governor Blagojevich and the people of Illinois who elected him.

It is for these reasons that on behalf of the American citizenry of the state of Illinois and Governor Rod Blagojevich, you have been sued.

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### III. Relief

We ask that the court assign a fair, impartial judge who does not harbor deep-seated resentment against Governor Blagojevich to preside over this case. We demand an evidentiary hearing to bring forth and litigate our claims at the earliest convenience of the court. We also demand a trial against the defendants and make a jury demand so that our fellow citizens may decide on the merits of our claims due to the American people's rapidly deteriorating trust and faith in our nation's judges and the judiciary as a whole. We seek the following relief from this court and our fellow citizens:

- 1) A preliminary injunction barring Governor JB Pritzker from signing any new laws or engaging in any of his official gubernatorial duties until this case is concluded due to our likelihood of success on the merits.
- 2) Declaratory judgment in the form of all defendants in this case being found guilty and thus civilly liable on all claims we have brought forth and subsequently referred to Attorney General Pamela Bondi for possible criminal prosecution.
- 3) Declaratory judgment in the form of Governor Blagojevich's 2009 impeachment and removal from office by The Illinois General Assembly being declared illegal, NULL AND VOID and wiped from the historical record on the basis that he has been found innocent on all of the allegations for which he was impeached by the highest law enforcement officer in the land, President Donald J. Trump.

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4) The immediate removal of JB Pritzker from the office of the Governor of Illinois on the basis that Governor Blagojevich's impeachment was illegitimate and NULL AND VOID and hence Rod Blagojevich is still the lawfully elected Governor of Illinois and JB Pritzker is illegally occupying and trespassing in his office.

5) The immediate return and reinstatement of Governor Rod R. Blagojevich, the duly and lawfully elected Governor of Illinois, to the office that was illegally stolen from him and the people of Illinois by the defendants in this case so that he may finish serving out his second term and seek re-election to the office of Governor or any statewide office in Illinois should he so choose. His term shall resume from the day that he was illegally removed from office in January of 2009. We the citizenry hereby demand his immediate return to office and that this case be expedited on an emergency basis to prevent additional irreparable harm to the citizenry of Illinois by the illegitimate administration that is illegally taking up residence in the office of Governor against the people's will. We also demand that the citizens of Illinois be designated as a protected class in this matter since it is their Constitutional rights that are being violated.

Signed this 12<sup>th</sup> day of May, 2025

Joshua A. Hall  
(Signature of Plaintiff)

Eric Welton  
(Signature of Plaintiff)



NAME: Joshua Hall  
D.C.P.# 104525  
DAUPHIN COUNTY PRISON  
501 MALL ROAD  
HARRISBURG PA 17111-1299

HARRISBURG PA 171

12 MAY 2025 PM 4 L



ATTN: The Clerk of Court  
U.S. District Court-Northern District of Illinois  
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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

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